Before the FEDERAL COMMUINCATIONS COMMISSION

DA 25-219 Released: March 12, 2025
RE: DELETE, DELETE, DELETE
GN Docket No. 25-133

Comments Due: Friday, April 11, 2025

SUMMARY:

With this filing, Turbo Technical Services ("TTS") makes comment in the above noted proceeding, requesting Commission consideration of deletion or modification of specific Rules and Regulations as outlined in the Public Notice. TTS has been involved in FCC application and licensing process since 1981 and has filed thousands of applications for hundreds of clients for AM, FM and FM translator stations and modifications. Their extensive experience with FCC processes gives them a unique and real-world view of the impact of Commission Rules and Regulations.

COMMENT:

TTS requests modification of Section 73.3587 to remove superfluous and irrelevant Objections being filed. Specifically, this section states *"Before FCC action on any application for an instrument of authorization, any person may file informal objections to the grant in LMS."* This provision has been grossly abused by national level organizations and individuals who have filed hundreds of objections for applications completely removed from their involvement. The Commission Staff is well aware of the myriad of Objections filed in the latest LPFM window by groups and individuals who demonstrated no connection to the application, nor could possibly have been harmed in any way by it. Yet, those objections consumed untold hours of FCC staff response, and caused thousands of dollars in useless legal services by the applicants.

If the concept of an "Informal Objection" is to be retained, then the filing entity must be required to prove legal standing and possible harm before being considered by the FCC and use the limited FCC staff time and resources. The abuse of this policy must be curtailed.

A thorough review of this is hereby encouraged.

Respectfully Submitted

Jim Turvaville, Owner
Turbo Technical Services